

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARY K. BOLEY, *et al.*,

Plaintiffs,

v.

UNIVERSAL HEALTH SERVICES, INC., *et al.*,

Defendants.

Case No: 2:20-cv-02644

**SUPPLEMENTAL DECLARATION OF CORNELIA VIEIRA CONCERNING
THE MAILING OF THE SETTLEMENT NOTICE AND FORMER
PARTICIPANT CLAIM FORM**

I, Cornelia Vieira, declare:

1. I am a Project Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over five years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred (500) class action cases since its inception. I am over 21 years of age and am not a party to this Litigation. I have personal knowledge of the facts set forth herein.

2. I respectfully submit this supplemental declaration in order to provide the Court and the parties to the Litigation with updated information regarding the mailing of the notice to inform Class Members¹ of the Settlement.

3. As noted in the Declaration of Cornelia Vieira Concerning the Mailing of the Settlement Notice and Former Participant Claim Form, dated December 9, 2022 (the “Vieira Declaration”), SCS completed the mailings for the 97,807 Class Members on December 5, 2022.

¹ All capitalized terms not otherwise defined herein have the meanings set forth in the Settlement Agreement, dated as of October 20, 2022 (the “Settlement Agreement”).

Out of the 97,807 Class Members, 43,940 Class Members were identified as non-active in the class data and were mailed the Court-approved Notice of Pendency of Class Action and Proposed Settlement (the “Notice”) along with a Former Participant Claim Form (“Claim Form”). The remaining 53,867 Class Members received a Notice only as they are currently active participants. Additionally, as noted in the Vieira Declaration, SCS emailed 86,883 Class Members for whom email addresses had been provided on December 5, 2022.

4. Out of the 43,940 Notice and Former Participant Claim Forms mailed, 3,827 were returned as undeliverable. Of these, the United States Postal Service provided forwarding addresses for 269, and SCS immediately mailed another Notice and Former Participant Claim Form to the updated addresses. The remaining 3,558 Notice and Former Participant Claim Forms returned as undeliverable, where no claim had been filed yet, were “skip-traced” to obtain updated addresses and 3,085 were re-mailed to updated addresses.

5. Out of the 53,867 Notices mailed for the active accounts, 1,536 were returned as undeliverable. Of these, the United States Postal Service provided forwarding addresses for 210, and SCS immediately mailed another Notice to the updated addresses. The remaining 1,326 Notices returned as undeliverable were “skip-traced” to obtain updated addresses and 992 were re-mailed to updated addresses.

6. The Vieira Declaration stated that by December 5, 2022, SCS had established the website for the Settlement, www.strategicclaims.net/UHS401k, and on December 5, 2022 made available a toll-free phone number (866-274-4004). SCS continues to maintain the website and to respond to Class Members’ inquiries.

7. To date, SCS has received copies of two objections, which were filed with Court for this Case 2:20-cv-02644-MAK as Documents 117 and 118, which were provided to our office

from Plaintiff's Counsel. To date, SCS has not received any further objections to the fairness, reasonableness or adequacy of the Settlement, to any term of the Settlement Agreement, to the Plan of Allocation, or to proposed payment of costs for administering the Settlement, attorneys' fees and costs, or Class Representatives' Case Contribution Awards. The deadline by which objections must be postmarked is March 9, 2023.

8. The 53,867 Class Members who are active will automatically receive the benefit of the Settlement. To date, SCS has received 6,800 Former Participant Claim Forms. The deadline for submitting the Former Participant Claim Form is February 28, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15th day of February 2023, in Media, Pennsylvania.



Cornelia Vieira